

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO BE PERMITTED TO FLY
AN AIRCRAFT ON FEBRUARY 13, 2006 FROM CASA GRANDE, ARIZONA**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to permit him to fly an aircraft on February 13, 2006 from Casa Grande, Arizona to Cottonwood, Arizona for approximately three (3) hours. The purpose of the flight is to negotiate a possible real estate offer for a local developer, Turn Key Homes, Inc. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from flying an aircraft.
2. Mr. Reid and undersigned counsel were before this Honorable Court on January 5, 2006 at 10:00 a.m. for oral argument on his *Motion to Modify Conditions of Release*. At that hearing, the Court ruled that Mr. Reid would not be permitted to fly an aircraft with the caveat that if Mr. Reid submitted a proper motion regarding future flights, the Court would consider it on a “piece-mail” basis.

3. Mr. Reid has the opportunity to earn money by flying an aircraft from the City of Casa Grande to Cottonwood on February 13, 2006. Mr. Reid has received such an offer from Turn Key Homes, Inc. According to a letter from Turn Key Homes, Inc.'s President, James Wyman, the flight would "originate from the Casa Grande Airport and return to the same. The flight should take approximately three hours and will be conducted in a direct route with a one hour layover at Cottonwood." A true and accurate copy of Mr. Wyman's correspondence is attached hereto as Exhibit "A."

4. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Jose Valencia, and Mr. Valencia stated that he has no objection to Mr. Reid flying an aircraft on February 13th.

5. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Sandra Toledo, and Ms. Toledo stated that she has no objection to Mr. Reid flying an aircraft on February 13th.

6. Undersigned counsel has contacted Assistant United States Attorney James Braun and Mr. Braun has stated he has no objection to Mr. Reid flying an aircraft on February 13th.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him fly an aircraft on February 13, 2006 to fulfill an obligation with Turn Key Homes, Inc.

RESPECTFULLY SUBMITTED this 8th day of February, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
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I hereby certify that a true and correct copy
of the foregoing was filed electronically with
the court and faxed to the Assistant United States
Attorney and mailed to the following this 8th
day of February, 2006.

/s/ electronically signed

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